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March 25, 2014

VIA E-FILING

Honorable Harold Baer, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: In re Application of Dr. Heleen Mees
Case No. 14-MC-00056-P1

Dear Judge Baer:

This firm represents Citigroup Inc. ("Citi")¹ in the above-captioned matter. We write to respectfully request an extension of time to respond to Dr. Heleen Mees' ("Applicant") request for leave to issue subpoenas to Citi in connection with a foreign proceeding in the Netherlands. Olav Haazen, counsel for Applicant has consented to this request. As a result, we have enclosed, for your approval, a Stipulation extending Citi's time to respond to Applicant's application through and including April 7, 2014.

As we have discussed with Mr. Haazen, Citigroup does not intend to oppose Dr. Mees' application in its entirety. Rather, the proposed extension is requested so that our client can undertake a review of the requested information, which is extensive, and determine what discovery can and should be produced. Also, I will work with Citi to identify any document or deposition discovery to which we object in the hope that we can meet and confer with Mr. Haazen to resolve the issue amicably. If not, we would reserve the right to object to the scope and timing of certain requests for documents and depositions upon the close of the proposed extension, April 7, 2014.

Assuming the Stipulation meets with your approval, please execute the Order.

¹ References herein to "Citi" shall mean Citigroup Inc., its subsidiaries, and its and their affiliates, including, but not limited to Citigroup Global Markets Inc.

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Thank you for your consideration of this matter.

Respectfully submitted,

MC ELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

A handwritten signature in black ink, appearing to read "J. Michael Riordan". The signature is fluid and cursive, with a large initial "J" and "M".

J. Michael Riordan

JMR/hjm

Encl.

cc: Olav A. Haazen, Esq. (with encl.)

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

J. Michael Riordan, Esq.
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& CARPENTER, LLP
88 Pine Street, 24th Floor
New York, New York 10005
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Attorneys for Citigroup Inc.

IN RE APPLICATION OF DR. HELEEN
MEES,

Applicant,

For Leave to Issue Subpoenas for the
Taking of a Deposition and the
Production of Documents Pursuant to 28
U.S.C. § 1782

14-MC-00056-P1

STIPULATION TO EXTEND TIME
TO RESPOND TO APPLICATION FOR
LEAVE TO ISSUE SUBPOENAS
PURSUANT TO 28 U.S.C. § 1782

THIS MATTER, having been opened to the Court by Boies, Schiller & Flexner
LLP, attorneys for Applicant Dr. Heleen Mees ("Applicant"), and McElroy, Deutsch,
Mulvaney & Carpenter, LLP, attorneys for Citigroup Inc. ("Citi")¹;

IT IS HEREBY STIPULATED AND AGREED that the time in which Citi must
respond to the application of Applicant seeking leave to issue subpoenas pursuant to 28
U.S.C. § 1782 filed in the above-referenced matter is hereby extended to April 7, 2014.

No prior requests have been made or granted in this matter.

By: 

Olav A. Haazen, Esq.
BOIES, SCHILLER & FLEXNER LLP
333 Main Street
Armonk, New York 10540
Attorneys for Dr. Heleen Mees

Dated: March 25, 2014

By: 

J. Michael Riordan, Esq.
McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP
88 Pine Street, 24th Floor
New York, New York 10005
Attorneys for Citigroup Inc.

Dated: March 25, 2014

¹ References herein to "Citi" shall mean Citigroup Inc., its subsidiaries, and its and their affiliates, including, but not limited to Citigroup Global Markets Inc.

SO ORDERED:

Dated: _____, 2014

Honorable Harold Baer, U.S.D.J.